

From: Rapp, Michael F
Sent: Friday, March 06, 2015 12:55 PM
To: Briel, Ron
Subject: licensure of CSFA and registry of CST

Dear Mr. Briel,

I am fully in support of licensing scrub techs so they can return to doing the jobs they are trained to do in the OR. The ones I work with are well trained, reliable and make a difficult operative case much easier.

I have been told however that the present law as written would make the scrub tech "personally supervised" by an OR nurse.

I do not understand why this is necessary. Their jobs are different. OR nurses are rarely good at being scrub techs, and there are numerous cases where the scrub tech understands what is done intraoperatively better than a nurse. A scrub tech is actively participating in a case every second while the OR nurse often has her back turned working on the computer or simply sitting waiting to see if she will be needed.

In other words, the OR nurse understands the OR as a whole but the scrub tech understands the operative case.

I have no problem with supervision. I just feel it should not be as limited as "personal". "responsible" or even "direct" supervision may be more appropriate.

Sincerely,

Michael F. Rapp, M.D., FACS